

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:20-cv-39

\$5,000 FROM VOUCHERA LLC, WELLS
FARGO ACCOUNT 7337,

\$31,248.60 FROM VOUCHERA LLC, WELLS
FARGO ACCOUNT 2892,

\$65,099.63 FROM VOUCHERA LLC, WELLS
FARGO ACCOUNT 4061,

\$289,004.85 FROM ELVI LLC, WELLS
FARGO ACCOUNT 1471,

\$113,291.30 FROM GABRIEL W CRISTELLO
IRREVOCABLE & STEVEN JULIVER TTE,
WELLS FARGO ACCOUNT 8105,

\$150,756.77 FROM GABRIEL W CRISTELLO
IRREVOCABLE & STEVEN JULIVER TTE,
WELL FARGO ACCOUNT 0962;

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Jeffrey R. Bengel, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of the following property (collectively the “Defendant Property”) pursuant to 18 U.S.C. § 981(a)(1)(C):

- a. \$5,000 from Vouchera LLC, Wells Fargo account 7337;
- b. \$31,248.60 from Vouchera LLC, Wells Fargo account 2892;
- c. \$65,099.63 from Vouchera LLC, Wells Fargo account 4061;
- d. \$289,004.85 from Elvi LLC, Wells Fargo account 1471;
- e. \$113,291.30 from Gabriel W Cristello Irrevocable & Steven Juliver TTE, Wells Fargo account 8105; and,
- f. \$150,756.77 from Gabriel W Cristello Irrevocable & Steven Juliver TTE, Well Fargo account 0962.

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. From in and around 2016 and continuing until February 2019, Steven Juliver was an owner of Vouchera LLC. Upon information and belief, Gabriel W Cristello is Steven Juliver's spouse.

4. Credit card companies, many of which were federally insured financial institutions or subsidiaries of federally insured financial institutions, had policies and controls that precluded the use of their products, services, and property for the sale of designer drugs and other high-risk items.

5. Vouchera LLC, which was run by Steven Juliver and other individuals, was in the business of helping these high-risk merchants obtain credit card payment processing by circumventing the policies and controls of the credit card companies. The scheme devised and executed by Vouchera made transactions for designer drugs and other high-risk items appear to the credit card companies as if they were transactions for goods and services that were not covered by the credit card companies' policies and controls.

6. This was accomplished through a series of misrepresentations to the credit card companies about the nature of the transactions that the credit card companies' products, services,

and property were being used to process. If the credit card companies had known the true nature of the transactions, they would not have allowed their products, services, and property to be used in connection with them.

7. When high-risk merchants sold their products using the scheme executed by Vouchera, proceeds were generated. These proceeds were held in, and transferred between, each of the accounts described below.

8. Accordingly, funds contained in each of the accounts below represent property which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 1344 and 1349.

9. Records reveal that Wells Fargo account 7337 was opened in the name of Vouchera LLC, with Steven Juliver listed as an executive. On or about February 27, 2019, pursuant to a federal seizure warrant, funds in Wells Fargo account 7337 in the amount of \$5,000 were seized.

10. Records reveal that Wells Fargo account 2892 was opened in the name of Vouchera LLC, with Steven Juliver and Gabriel W Cristello listed as executives. On or about February 27, 2019, pursuant to a federal seizure warrant, funds in Wells Fargo account 2892 in the amount of \$31,248.60 were seized.

11. Records reveal that Wells Fargo account 4061 was opened in the name of Vouchera LLC, with Steven Juliver and Gabriel W Cristello listed as executives. On or about February 27, 2019, pursuant to a federal seizure warrant, funds in Wells Fargo account 4061 in the amount of \$65,099.63 were seized.

12. Records reveal that Wells Fargo account 1471 was opened in the name of Elvi LLC, with Steven Juliver listed as the owner. On or about February 27, 2019, pursuant to a

federal seizure warrant, funds in Wells Fargo account 1471 in the amount of \$289,004.85 were seized.

13. Records reveal that Wells Fargo account 8105 was opened in the name of Gabriel W Cristello Irrevocable and Steven J Juliver. On or about February 27, 2019, pursuant to a federal seizure warrant, funds in Wells Fargo account 8105 in the amount of \$113,291.30 were seized.

14. Records reveal that Wells Fargo account 0962 was opened in the name of Gabriel W Cristello Irrevocable and Steven J Juliver. On or about February 27, 2019, pursuant to a federal seizure warrant, funds in Wells Fargo account 0962 in the amount of \$150,756.77 were seized.

15. By reason of the foregoing, the Defendant Property is forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C).

WHEREFORE, the United States respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,


SCOTT W. BRADY
United States Attorney

/s/ Jeffrey R. Bengel
JEFFREY R. BENGEL
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VERIFICATION

I am a Special Agent of the Food and Drug Administration, and the case agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct. Executed on this 7 day of January, 2020.



Sean Grillo, Special Agent
Food and Drug Administration